

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JESSE MENDOZA,
a/k/a Jesus Mendoza,

Defendant.

) INDICTMENT

)

) (18 U.S.C. § 982(a)(1))

) (18 U.S.C. § 982(b)(1))

) (21 U.S.C. § 841(a)(1))

) (21 U.S.C. § 841(b)(1)(A))

) (21 U.S.C. § 841(b)(1)(B))

) (21 U.S.C. § 846)

) (21 U.S.C. § 853)

)

)

CR 10-313 DWF/FLN

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute and
Possess with Intent to Distribute)

From in or about January of 2005 and continuing through in or
about October, 2010, in the State and District of Minnesota, the
defendant,

JESSE MENDOZA,
a/k/a Jesus Mendoza,

knowingly and intentionally conspired with other persons, whose
names are known and unknown to the grand jury, to distribute and
possess with intent to distribute 5 kilograms or more of a mixture
and substance containing a detectable amount of cocaine, a
controlled substance, and 100 kilograms or more of a mixture or
substance containing marijuana, a controlled substance, in
violation of Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(A), 841(b)(1)(B) and 846.

FILED NOV 17 2010
RICHARD D. SLEITEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____

SCANNED

JAN 04 2011

U.S. DISTRICT COURT ST. PAUL

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FORFEITURE ALLEGATIONS

If convicted of Count 1 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), any property, real or personal constituting, or derived from, any proceeds he obtained, directly or indirectly as a result of such violation; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation, including but not limited to the following property:

- a) 2006 Ford F 650, VIN 3FRNW65W46V371671;
- b) 2005 Volkswagen Touareg, VIN WVGLG77L65D012702;
- c) 2007 Chrysler Aspen, VIN 1A8HW58P07F526404;
- d) 2008 Saturn VUE XE, VIN 3GSCL33P38S724269;
- e) 2006 Dodge Charger SRT 8, VIN 2B3KA73W66H276638;
- f) 1969 Oldsmobile, VIN 336679Z124074;
- g) 2010 Chevrolet Camero SS, VIN 2G1FK1EJ1A9112088;
- h) an un-assembled 1970 Chevrolet Monte Carlo, VIN 138570L159075;
- i) 2005 Custom Built Motorcycle, VIN 1C14060S05R00256;
- j) 2008 Custom Built Motorcycle, VIN 1C14070S07R394;
- k) \$499,290.00 in U.S. currency;
- l) \$190,080.00 in U.S. currency;
- m) \$128,349.80 in US Bank account number x-xxx-xxxx-4593;
- n) 1965 Cessna 182H Single Engine Airplane, Tail Number N8409S;

- o) Miscellaneous recording equipment seized on September 2, 2010;
- p) Miscellaneous jewelry valued at \$695,670.00 seized on September 2, 2010;
- q) 1712 Arlington Avenue East, St. Paul, Minnesota; and
- r) 263 Battle Road, South Haven, Minnesota.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), including but not limited to, the real premises and property located at 3656 North 140th Avenue, Hart, Michigan.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON